

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CONTINENTAL CASUALTY COMPANY and) CONTINENTAL INSURANCE COMPANY))) Plaintiffs,))) v.) Case No. 07-CV-6912) Honorable Harry D. Leinenweber) Magistrate Judge Arlander Keys COMMERICAL RISK RE-INSURANCE) COMPANY, COMMERCIAL RISK) REINSURANCE COMPANY LIMITED,) GENERAL SECURITY INDEMNITY) COMPANY OF ARIZONA, GENERAL) SECURITY NATIONAL INSURANCE) COMPANY, GIE COLUMBUS, SCOR, and) SCOR REINSURANCE COMPANY,)) Defendants.)

**MOTION FOR EXTENSION OF
TIME FOR DEFENDANTS TO FILE REPLY BRIEF**

Defendants Commerical Risk Re-Insurance Company, Commercial Risk Reinsurance Company Limited, General Security Indemnity Company of Arizona, General Security National Insurance Company, GIE Columbus, SCOR, S.E., and SCOR Reinsurance Company (“SCOR”), by its attorneys, moves pursuant to Fed. R. Civ. P. 6(b) for an extension of time to file its reply brief in support of it’s motion to stay. In support thereof, Defendants state as follows:

1. Pursuant to order of this Court, Defendants must to file their reply brief in support of their motion to stay proceedings on April 24, 2008.
2. On April 18, 2004, the day after Plaintiffs (collectively “CNA”) filed their Opposition Brief in response to the motion to stay, counsel for CNA and SCOR discussed the possibility of settlement.
3. Since then, the parties have begun a process to determine if an amicable resolution of this matter is possible.

4. Based upon informal discussions with counsel for CNA, SCOR refrained from incurring the costs needed to prepare a reply brief which may prove to be unnecessary.

5. During these discussions, SCOR informed CNA that if it were to refrain from preparing its brief, it would need CNA to agree a two week extension due to the fact that one of SCOR's attorneys was leaving the state for vacation beginning on April 25 and the other two attorneys are preparing for trial in Texas. SCOR was given to understand that this would be acceptable to CNA. In return, and at CNA's request, SCOR agreed to stay the pending arbitration of these issues for two weeks.

6. Yesterday, one day before its brief was due, SCOR learned that CNA would only agree to an extension until Monday, April 28, 2008, even though the parties have scheduled further settlement negotiations for tomorrow, Friday, April 25, 2008.

7. Under ordinary circumstances, it would still be possible to prepare a brief in this shortened time-frame. However, SCOR's attorneys are simply unavailable this weekend due to vacation and trial preparation.

8. SCOR asks that this Court grant it the two week extension to prepare its brief in the event settlement negotiations are unsuccessful.

9. Defendants' motion is not brought for purposes of needlessly delaying the proceedings and will not prejudice any party.

WHEREFORE, Defendants respectfully request that this Court grant their motion for an extension of time to file their reply brief in support of their motion to stay to and including May 9, 2008.

Dated: April 24, 2008

Respectfully submitted,

**COMMERCIAL RISK RE-INSURANCE
COMPANY, COMMERCIAL RISK
REINSURANCE COMPANY LIMITED,
GENERAL SECURITY INDEMNITY
COMPANY OF ARIZONA, GENERAL
SECURITY NATIONAL INSURANCE
COMPANY, GIE COLUMBUS, SCOR, and
SCOR REINSURANCE COMPANY**

By: /s/ Michael C. Kasdin
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